

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO, et  
al.,

Defendants.

No. 12-cv-2039 (GAG)

**JOINT MOTION IN COMPLIANCE WITH JANUARY 28, 2016 ORDER**

COME NOW, Plaintiff, United States of America, and Defendants, Commonwealth of Puerto Rico, et al. (collectively, the “Parties”), and respectfully and jointly certify that all necessary arrangements have been made to secure interpreter services for the March 17-18, 2016 public hearing in Fajardo, Puerto Rico, in compliance with this Court’s January 28, 2016 Order (Dkt. No. 304).

1. On January 25, 2016, the Court issued a Scheduling Order setting the Third Public Hearing on the Puerto Rico Police Reform (“Third Public Hearing”) for March 17-18, 2016 in the Commonwealth Courthouse Building in Fajardo, Puerto Rico (Dkt. No. 302). The hearing provides the Parties and other interested parties with a forum to inform the Court and the public about the implementation of the Agreement for the Sustainable Reform of the Puerto Rico Police Department, with an emphasis on the communities in the eastern region of Puerto Rico. *Id.* at 1-2. The Court instructed the Parties to arrange for real-time interpretation to ensure that the proceedings are recorded officially in the English language and to share the cost of this service. *Id.* at 2.

2. On January 28, 2016, the Court ordered the Parties to certify by February 9, 2016 that all translation services have been coordinated for the celebration of the Third Public Hearing (Dkt. No. 304). The Court also instructed the Parties to determine whether any additional arrangements are necessary to ensure proper placement of equipment in light of the specific configuration of the Fajardo courthouse. *Id.*
3. The Parties hereby certify that all arrangements have been made to coordinate appropriate interpreter services for the Third Public Hearing and that the services will be similar to those rendered during the Second Public Hearing in Ponce, Puerto Rico. The Parties have secured the same vendor, which will provide real-time interpreter services for the hearing, all necessary equipment (e.g., interpreter booth, headphones, microphones, audio console), and set up. Officials from the Puerto Rico Police Department also accompanied the vendor on a visit to the Fajardo courthouse on February 8, 2016 to inspect the premises and determine the proper placement of equipment. The Parties will also share the cost of the services.

WHEREFORE, the Parties respectfully request that the Court take notice of the Parties' certification in compliance with this Court's January 28 Order.

Respectfully submitted,

FOR PLAINTIFF UNITED STATES:

STEVEN H. ROSENBAUM  
Chief

S/ LUIS E. SAUCEDO  
CHRISTY LOPEZ  
Deputy Chief  
LUIS E. SAUCEDO (G01613)  
Counselor to the Chief  
BRIAN BUEHLER

FOR DEFENDANT COMMONWEALTH OF  
PUERTO RICO:

CESAR MIRANDA  
Secretary of Justice

S/ BEATRIZ ANNEXY GUEVARA  
BEATRIZ ANNEXY GUEVARA  
USDC-PR # 217505  
Special Assistant to the Secretary  
P.R. Department of Justice  
P.O. Box 9020192

LYNDA GARCIA  
Trial Attorneys  
U.S. Department of Justice  
Civil Rights Division  
Special Litigation Section  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
Tel: (202) 598-0482  
Fax: (202) 514-4883  
luis.e.saucedo@usdoj.gov

Attorneys for Plaintiff

San Juan, PR 00902-0192  
Tel: (787) 721-7700, ext. 2105  
Fax: (787) 722-4440  
bannexy@justicia.pr.gov

Attorneys for Defendants

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically on this 9th day of February 2016, with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

S/ LUIS E. SAUCEDO  
LUIS E. SAUCEDO  
Counselor to the Chief  
U.S. Department of Justice  
Civil Rights Division  
Special Litigation Section  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
Tel: (202) 598-0482  
Fax: (202) 514-4883  
Email: luis.e.saucedo@usdoj.gov

Attorney for Plaintiff